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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

Case No. 20-CV-08570-LHK

The Hon. Lucy H. Koh

CLASS ACTION

**DECLARATION OF BRIAN J. DUNNE IN
SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL TEXT FROM JOINT
DISCOVERY LETTER BRIEF RE:
PRIVILEGE DISPUTE**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am an attorney at Bathaee Dunne LLP, Interim
4 Co-Lead Counsel for the Advertiser Plaintiffs (the “Submitting Party”) in the above-captioned matter.
5 I have personal knowledge of the facts set forth herein and, if called as a witness, could and would
6 testify competently to them.

7 2. This declaration is made in support of Submitting Party’s Administrative Motion to File
8 Under Seal (“Motion”) text from Advertiser and Consumer Classes and Defendant Facebook, Inc.’s
9 (the “Designating Party”) Joint Discovery Letter Brief re: Privilege Dispute (“Letter Brief”).

10 3. Attached hereto as Exhibit 1 is the Letter Brief in redacted form. Civil L.R. 79-
11 5(d)(1)(C).

12 4. Attached hereto as Exhibit 2 is the Letter Brief in unredacted form. The portions of the
13 document sought to be sealed are highlighted. Civil L.R. 79-5(d)(1)(D).

14 5. The highlighted portions of the Letter Brief reflect contents of documents produced and
15 designated “CONFIDENTIAL” by Designating Party under the Stipulated Protective Order
16 (“Protective Order”) entered on June 21, 2021 (ECF No. 111).

17 6. Submitting Party’s request is limited to documents produced by Designating Party
18 marked CONFIDENTIAL, or information directly reflecting documents produced by Designating Party
19 marked CONFIDENTIAL. This request is thus narrowly tailored to seek sealing only of sealable
20 material.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is true
22 and correct.

23 Executed on October 14, 2021 in Pasadena, California.

24 s/ Brian J. Dunne
25 BRIAN J. DUNNE
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